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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**GOOGLE LLC'S ADMINISTRATIVE
MOTION UPDATING THE COURT ON
ITS PRESERVATION
IMPLEMENTATION EFFORTS AND
SEEKING RELIEF FROM THE JULY 30
DEADLINE IMPOSED BY THE JULY 15,
2022 PRESERVATION ORDER (DKT. 630)**

Referral: Hon. Susan van Keulen, USMJ

1 **II. REQUEST FOR RELIEF FROM THE JULY 30 DEADLINE**

2 The July 15 Order requires Google to complete the following tasks by July 30, 2022: [REDACTED]

3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED] Dkt. 630 at 2.

8 Google is working diligently to implement the order. In light of the technical complexity
9 required to implement the order, Google respectfully requests relief from the current deadline. To
10 complete this data decryption and re-encryption process, Google needs to: [REDACTED]

11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED] Kornacki

20 Decl. ¶ 4.

21
22 Google engineers working on this project have made substantial progress toward the goal of
23 developing and implementing the above-described solutions. *Id.* ¶ 5. But unfortunately, despite
24 Google's extensive efforts, it will not be possible to complete the required tasks by the July 30, 2022
25 deadline. *Id.* On the basis of the information available at this stage, Google respectfully requests a 30-
26 day extension, until August 29, 2022 to complete this process for new data written; and a 60-day
27 extension, until September 28, 2022 for the data backfill process to complete. *Id.* ¶¶ 6, 7.
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1 DATED: July 27, 2022

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2 By /s/ Andrew H. Schapiro

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